



LIEUTENANT RANDY JEMERSON 10/28/2020

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24	James R. Wyrsh, Esq.)	
25		

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   EASTERN DISTRICT OF MISSOURI  
3                   EASTERN DIVISION  
4   CHRISTOPHER ROBERTSON,           )  
5                   Plaintiff,           )  
6   vs.                                ) Cause No.  
7   CITY OF SAINT LOUIS, et al.) 4:18-cv-01570-JAR  
8                   Defendants.        )  
9

10               ZOOM/VIDEO RECORDED DEPOSITION OF LIEUTENANT  
11   RANDY JEMERSON, produced, sworn, and examined on the  
12   28th day of October, 2020, via Zoom before Susan M.  
13   Fiala, Registered Professional Reporter, Certified  
14   Court Reporter, within and for the State of Missouri,  
15   in a certain cause now pending in the United States  
16   District Court, Eastern District of Missouri, Eastern  
17   Division, between CHRISTOPHER MONROE, Plaintiff, and  
18   CITY OF SAINT LOUIS, et al., Defendants.  
19  
20  
21  
22  
23  
24  
25

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1 A P P E A R A N C E S:

2

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1 S T I P U L A T I O N

2 It IS HEREBY STIPULATED AND AGREED by and  
3 between counsel for the parties that this deposition  
4 may be taken in shorthand by Susan M. Fiala, Certified  
5 Court Reporter, Registered Professional Reporter, and  
6 afterwards transcribed into printing, and signature by  
7 the witness is reserved.

8 (THEREUPON, the deposition start time was  
9 9:29 a.m.)

10 LIEUTENANT RANDY JEMERSON,  
11 being first duly sworn to tell the truth, the whole  
12 truth and nothing but the truth, deposes and says as  
13 follows:

14 VIDEOGRAPHER: We are on the record.  
15 Today's date is October 28th, 2020, and the time  
16 is 9:29 a.m.

17 This is the video recorded deposition  
18 of Randy Jemerson, Lieutenant, in the matter of  
19 Christopher Robinson V. City of St. Louis, et  
20 al., Case Number 418-cv-01570-JAR in the United  
21 States District Court, Eastern District of  
22 Missouri, Eastern Division.

23 This deposition is being recorded  
24 remotely. The reporter's name is Susan Fiala.  
25 My name is Larry Katz. I'm the legal

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1 videographer. We are with Alaris Litigation  
2 Services.

3 Would the court reporter please speak  
4 your stipulation and then swear in the witness?

5 COURT REPORTER: Yes. Gentlemen, I  
6 just need to get on the record that you both  
7 stipulate -- or you stipulate to the fact that  
8 this is a remote deposition, and I will be  
9 swearing the witness in remotely as well?

10 MR. WYRSCH: Plaintiff stipulates to  
11 that.

12 MR. LAIRD: Defendants stipulate as  
13 well.

14 LIEUTENANT RANDY JEMERSON,  
15 being duly sworn to tell the truth, the whole  
16 truth and nothing but the truth, deposes and  
17 says as follows:

18 VIDEOGRAPHER: You may proceed.

19 EXAMINATION

20 BY MR. WYRSCH:

21 Q. Good morning. Can you -- my -- I guess  
22 I'm understanding you can't see me, so I am a  
23 dis --

24 A. I can --

25 Q. What?

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1           A. I can. It's just a small -- it's very  
2 small.

3           Q. A tiny little box? Okay.

4           A. Yeah.

5           Q Yeah. I -- I was worried I'd be like a  
6 disembodied voice speaking to you.

7                   So my name is Jim Wyrsh. I represent  
8 the Plaintiffs in a number of these cases.

9                   Can you identify yourself for the  
10 record?

11           A. Lieutenant Randy Jemerson of the St.  
12 Louis Metropolitan Police Department.

13           Q. Okay. I'll start off asking you -- I'm  
14 going to read off the names of the Plaintiffs in  
15 these various individual cases where you've been  
16 named as a defendant, and just let me know if  
17 you know them either prior to or after the  
18 incident on September 17th, 2017.

19                   So let me start with Fareed Alston?

20           A. No.

21           Q. Brian Bodie? [ph]

22           A. No.

23           Q. Emily Davis?

24           A. Yes.

25           Q. How do you know Ms. Davis?

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1     that?

2           GA. I'm familiar with it. I've heard of  
3     it, but it's -- yeah. At this point, that was  
4     so long ago I -- I'd be guessing at what it was.  
5     I -- I think I recall what that is, but I -- I'm  
6     not 100 percent sure.

7           Q. Okay. If -- if you -- if you wanted  
8     access to the personnel file, could you get it  
9     as a sergeant?

10          A. I -- I think as long as I went through  
11     my lieutenant, I believe that's something I --  
12     I'd probably be able to -- to look at.

13          Q. So I want to ask you a little bit about  
14     what -- what was your -- what -- prior to 2017,  
15     what was the CDT relationship with the Bicycle  
16     Response Team?

17          A. So the Bicycle Response Team just  
18     started, I think, the end of 2016, I believe.  
19     They're -- they're obviously two separate  
20     entities. Myself and Sergeant Rossomanno kind  
21     of spearheaded that, bringing that to the  
22     department, but, I mean, that would be -- that  
23     would be about it.

24                 You know, we -- we kind of got it  
25     running and then they -- and then the bikes --



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1 the downtown bikes kind of are -- are in charge  
2 of it now. But -- so they work in conjunction  
3 with each other.

4 You know, depending on what type of  
5 event it is, you know, bikes might initially --  
6 might be the initial soft response, and then if  
7 things escalate to the point where -- where it  
8 gets to a level where the Civil Disobedience  
9 Team needs -- needs to get involved, then that's  
10 how that -- then that's -- that is what would  
11 happen next.

12 Q. Okay. So you -- you -- if I -- if I  
13 understood correctly, you and Sergeant  
14 Rossomanno went to the Republican National  
15 Convention in 2016, right?

16 A. Yes.

17 Q. And -- and there you -- you -- you guys  
18 were impressed by the Bicycle Response Team that  
19 -- that they had. It was in Cleveland?

20 A. Yes.

21 Q. And then -- and then you're also -- I  
22 think you brought a trainer in. Did you bring a  
23 trainer in or did the BRT bring the trainer in  
24 from Seattle?

25 A. No. That was Sergeant Rossomanno and

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1 -- both of us, but it was primarily Sergeant  
2 Rossomanno that was in speaking with them.

3 Q. Because Seattle has a pretty-well  
4 established BRT?

5 A. Correct.

6 Q. That they've used in the various  
7 protests they have there?

8 A. Correct.

9 Q. From the WTO onward?

10 A. Correct.

11 Q. All right. And you guys actually  
12 brought someone from Seattle to train the BRT?

13 A. Correct. It was -- it was a separate  
14 company. It wasn't the Seattle Police  
15 Department. It was a company outside of the  
16 department.

17 Q. But the officer came from Seattle?

18 A. Correct.

19 Q. Was he -- was he a -- was he full time  
20 with that company or was he -- was that a  
21 secondary gig for him? Was he still on -- was  
22 he still an employee of the Seattle Police  
23 Department?

24 A. Yes.

25 Q. Do you know if -- in Seattle, if the